

This rule making proposal is a bad idea all around. What is proposed is a complete change in Part 15 rules, a change that I as a citizen and taxpayer believe the FCC has no authority to do, and this change will weaken the protection to other services that Part 15 was intended for. Devices capable of substantial interference must be licensed and it has been shown that current users of the proposed allocations will be substantially interfered with (see the American Radio Relay League ex parte presentation of 14 January, 2002).

The privately owned company petitioning for these rule changes is a for profit company attempting to find a low cost way to provide the RFID service this change would allow. While I do not object to businesses attempting to keep costs low my lack of objection stops when those attempts add undue burdens to other businesses or individuals, in this case the amateur radio operators already utilizing the allocations. This proposal would place an undue interference burden on a service that performs life and property saving emergency communications when all other communications facilities fail, something that happens frequently in times of emergency. If the petitioner desires to offer a service for profit they should make the investment in technology required of everyone else who desires to make a profit and not force that investment from the safety and well being of others. The reason 'equipment for that allocation exists in other countries' is absurd, we should not allow the actions of other countries to dictate our communications policies.